## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MARK HEARSH,	)
Plaintiff,	)
v.	) Case No.: 08 CV 3100
MERCANTILE ADJUSTMENT BUREAU, LLC,	) Judge Hibbler
Defendant.	)

## AGREED MOTION FOR AN ENLARGEMENT OF TIME

Defendant, Mercantile Adjustment Bureau, LLC ("MAB") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

- 1. On or about May 29, 2008, plaintiff filed his Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA").
  - 2. Defendant's responsive pleading is due Monday, July 14, 2008.
- 3. Since appearing in the case, defense counsel has been discussing settlement with plaintiff's counsel. The parties have had fruitful discussions that remain ongoing at the time this motion is filed.
- 4. Defendant requests that its pleading date be extended to July 22, 2008 to permit the parties to complete settlement discussions, which, if successful, will negate the need for a responsive pleading.
- 5. The undersigned conferred with plaintiff's counsel regarding this motion on July 14, 2008. Counsel had no objection to the relief requested herein.

6. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

WHEREFORE, Defendant, Mercantile Adjustment Bureau, LLC, requests that this Court grant it an additional 9 days, up to and including July 22, 2008, to file its responsive pleading to plaintiff's Complaint.

Respectfully Submitted,

<u>s/Corinne C. Heggie</u>
One of the attorneys for
Mercantile Adjustment Bureau, LLC

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